



Received 7/25/05  
ROB ALCOTT  
DIRECTOR OF WATER AND NATURAL RESOURCES  
(510) 287-1127  
ralcott@ebmud.com

JON A. MYERS  
MANAGER OF NATURAL RESOURCES  
(510) 287-1121  
myers@ebmud.com

July 20, 2005

Mr. Paul Dabbs  
Statewide Planning Branch  
California Department of Water Resources  
P.O. Box 942836  
Sacramento, CA 94236-0001

Subject: EBMUD Comments on Draft California Water Plan 2005 (DWR Bulletin 160-03)

Dear Mr. Dabbs:

The East Bay Municipal Utility District (District) is pleased to provide comments on the 2005 Draft Update of the California Water Plan (Water Plan). Our comments are presented below and are organized by the sections to which they apply.

The District provides municipal and industrial water to 1.3 million customers in Alameda and Contra Costa Counties. The District is a recognized leader in managing its water resources, particularly in the implementation of water conservation and recycling projects to meet future water needs. Since the adoption of the District's Water Conservation Master Plan in 1994, water use in the District's service area has been reduced by 12.3 million gallons per day (MGD) through promotion of dynamic water conservation programs. Also, the recycled water programs have offset potable water use by 8.6 MGD.

The District's long-term water supply planning strategy is consistent with the Water Plan's emphasis on the need for state water suppliers to engage in cooperative regional planning to meet current and future water needs. Recognizing the importance of coordination, collaboration, and communication between agencies, the District is actively participating in several integrated regional water management planning efforts in the San Francisco Bay area, and in the Mokelumne and Sacramento River watershed areas. The District joined other Bay Area agencies to develop the San Francisco Bay Area Integrated Regional Water Management Plan (IRWMP). The District also participates in the Central and South Sacramento County Regional Partnership's joint effort to develop an IRWMP. The District has also agreed to participate as a partner with Amador Water Agency and Calaveras County Public Utilities in their IRWMP development.

The District is a co-founder and active participant in several regional collaborative partnerships formed to develop consensus-based water resources management programs in the Mokelumne River Watershed: Mokelumne River Forum, Upper Mokelumne River Watershed Authority, Mokelumne River Association, and Mountain Counties Water Resources Association.

Volume 1 – Strategic Plan

Chapter 2 – A Framework for Action

Page 2-5

Ensuring Reliable Water Supplies

Initiative 1 – Promote and Implement Integrated Regional Water Management

The Water Plan recommends collaboration among agencies within regions for development of integrated regional plans. Such collaboration has already begun in some regions; however, progress is difficult and slow from lack of funds for projects and hesitation by agencies to compromise on water issues. The State should offer more specific incentives to facilitate agency collaboration. Project funding assistance could increase or sustain the momentum of these collaborative processes. State sponsored mediation at collaboration meetings might encourage smoother agency cooperation. Legislation to offer these incentives could be introduced to provide “[S]tate government leadership, assistance and oversight...”

Chapter 3 – California Water Today

Page 3-5

In Box 3-5 – Examples of Ongoing Regional Water Planning Efforts

Add “Mokelumne River Basin Collaborative Planning Process.” This group is a collaboration of many agencies and organizations in the region which have a vital interest in sound management of the water resources on the Mokelumne River. Participants have recently entered into a Memorandum of Understanding (MOU) with the California Department of Water Resources (DWR) for funding of a facilitated collaborative process.

Chapter 4 – Preparing for an Uncertain Future

Page 4-4 and 4-5

Improving Water Data Management and Scientific Understanding

“DWR intends to build and maintain....Water Plan Information Exchange [PIE]....include information from locally developed urban and agricultural water management plans and local general plans.” This Information Exchange would be an effective tool to facilitate regional water resource planning. The District encourages DWR to continue progress in the Water PIE process, and include a timeline or schedule with specific milestones in completing the Water PIE project.

Chapter 5 – Implementation Plans

Recommendation 2 – Promote and Implement Integrated Regional Water Management

V1-Page 5-7

The benefits of IRWMP may be overstated. Regardless of the potential benefits, the widespread adoption of IRWMPs will require substantial ongoing state financial assistance.

Mr. Paul Dabbs  
DWR Bulletin 160  
July 20, 2005

Page 5-9

To their list of “Performance Measures” for IRWMPs, we suggest adding “Implementation of projects identified in the plans.”

Recommendation 4 - Maintain and Improve Aging Statewide Water Infrastructure

Page 5-11

Levee failures in the Sacramento-San Joaquin Delta are almost sure to disrupt California's water supply system in the next 50 years. The State should include a recommendation on the issue of Delta levee vulnerability, with in-depth analysis mitigating the risks associated with such vulnerabilities.

The Water Plan should adopt the recommendation from the ACWA Blueprint: Authorize an expert, independent commission develop a strategic plan for the Delta to address the threats of levee instability, major floods, seismic events, subsidence, sea level rise, and ecosystem failure.

Recommendation 8 – Develop Funding Strategies and Clarify Role of Public Investment

V1-Page 5-19

The term “user fees” is not defined or distinguished from potential surcharges or taxes that DWR might propose.

V1-Page 5-19 – Action Plan (third bullet)

The plan to “develop policy regarding investment of public funds in private water utilities” should be elaborated so that the State’s intended policy is signaled and clearly understood. This recommendation needs detailed and open analyses of how the state and regional water agencies would benefit.

Recommendation 10 – Adapt for Global Climate Change Impacts

V1-Page 5-22 – Action Plan

DWR should emphasize conjunctive use as a major tool to preserve and increase storage capacity with changing hydrology. Accelerating such projects should be included in the action plan.

Volume 3 – Regional Reports

Chapter 3 – San Francisco Bay

Page 3-3, [Acronyms]

Correct the District’s name to “East Bay Municipal Utility District”, not “Utilities.”

Page 3-3, [Acronyms]

BACWA (Bay Area Clean Water Agencies) should be added to the acronym box.

Page 3-5

Modify the text of the 2<sup>nd</sup> Bullet to read:

“...rationing of 68 percent based on 2020 projected demand. With the proposed intake from the Sacramento River at Freeport, rationing would be reduced to 28 percent during dry periods.”

Page 3-6

Mr. Paul Dabbs  
DWR Bulletin 160  
July 20, 2005

The capacity of the intertie between EBMUD and SFPUC should be listed as 30 MGD rather than 40 MGD.

Page 3-13

The discussion of the integrated regional water management plan (IRWMP) needs to be updated. The focus of the plan is within the SF Bay hydrologic region and the plan covers the nine Bay Area counties. Additionally, areas outside the hydrologic boundary are developing separate plans.

The Water Plan could offer a discussion of funding from Prop 50, Ch. 8 to assist agencies develop IRWMPs. In the San Francisco Bay Area, two planning grant proposals were submitted in May 2005 to develop the IRWMP. Implementation grant proposals will be submitted in July 2005 for projects that are part of the water supply – water quality section of the draft IRWMP.

Chapter 13 – Mountain Counties

Page 13-7

Under 'Regional Planning' add this discussion: Some counties and water districts meet regularly to discuss regional water issues. One example is the Mokelumne River Forum. The Forum consists of thirteen entities that have an interest in the Mokelumne Watershed and have signed an MOU to have DWR facilitate regional collaboration to help resolve the complex water supply issues.

Volume 4 – Planning

Financing Strategies and Guidelines for Funding Water Resources Projects

Page 2-13

We concur with the language in Box 2-6: "Terms such as benefit and baseline must be defined or replaced to ensure that all groups participating in project financing have a consistent frame of reference," and "[p]ublic funds should be used to pay for project actions that lead to broad public benefits, such as ecosystem restoration or other benefits that cannot be linked to a particular set of beneficiaries." Public benefits do not include any water infrastructure, backbone or otherwise, that benefits only a subset of the state's population.

Thank you for the opportunity for the District to provide comments on the Draft California Water Plan 2005. If you have any questions, please contact Lena Tam, Manager of Water Resources Planning at (510) 287-1240 or e-mail her at [ltam@ebmud.com](mailto:ltam@ebmud.com).

Sincerely,



William R. Alcott  
Director of Water & Natural Resources

WRA:LLT:PKJ:JHM:smc